

STATE OF SOUTH DAKOTA)
) SS.
COUNTY OF PENNINGTON)

STATE OF SOUTH DAKOTA,)
)
Plaintiff,)

vs.)
)
NICHOLAS TILSEN,)
)
Defendant.)

IN MAGISTRATE COURT

SEVENTH JUDICIAL CIRCUIT

CR1 20-2830

COUNT 1: C-4-FEL = 10/20

COUNT 2-4: C-6-FEL = 2/4

COUNTS 5-7: C-1-MISD

COUNTS 8: C-2-MISD

**AMENDED
COMPLAINT**

COUNT 1: SECOND DEGREE ROBBERY

COUNT 2: GRAND THEFT

**COUNT 3-4: SIMPLE ASSAULT ON A LAW
ENFORCEMENT/PUBLIC OFFICER**

COUNT 5: OBSTRUCTION

COUNT 6: IMPEDING HIGHWAY

COUNT 7: UNLAWFUL ASSEMBLY

COUNTS 8: DISORDERLY CONDUCT

The undersigned being duly sworn upon oath charges:

COUNT 1: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **SECOND DEGREE ROBBERY** in that (s)he did, without authority of law, intentionally take personal property, regardless of value, in the possession of Maria Gonzalez, from Maria Gonzalez's person or immediate presence and against Maria Gonzalez's will, by means of force, or fear of force, under circumstances not amounting to FIRST DEGREE ROBBERY, in violation of **SDCL 22-30-1, SDCL 22-30-6 and SDCL 22-30-7**, or

IN THE ALTERNATIVE

COUNT 2: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **GRAND THEFT**, in that s(he) did and there take, or exercise control over, property of any value taken from the person of Maria Gonzalez, to wit: police shield, with intent to deprive her of said property, in violation of **SDCL 22-30A-1** as stated in **SDCL 22-30A-17(3)**; and

COUNT 3: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **SIMPLE ASSAULT ON A LAW ENFORCEMENT/PUBLIC OFFICER**, in that (s)he did attempt by physical menace or credible threat to put Maria Gonzalez in fear of imminent bodily harm, with or without the actual ability to harm Maria Gonzalez while (s)he was a law enforcement or other public officer engaged in the performance of his/her duties, in violation of **SDCL 22-18-1(4) and SDCL 22-18-1.05**; and

COUNT 4: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **SIMPLE ASSAULT ON A LAW ENFORCEMENT/PUBLIC OFFICER**, in that (s)he did attempt by physical menace or credible threat to put Cameron Ducheneaux in fear of imminent bodily harm, with or without the actual ability to harm Cameron Ducheneaux while (s)he was a law enforcement or other public officer engaged in the performance of his/her duties, in violation of **SDCL 22-18-1(4) and SDCL 22-18-1.05**; and

COUNT 5: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **OBSTRUCTING A PUBLIC OFFICER** in that (s)he did then and there by using or threatening to use violence, force or physical interference or obstacle, intentionally obstruct, impair or hinder the official actions of a law enforcement officer, jailer, firefighter, emergency management personnel, or EMT, acting under the color of his/her official authority, in violation of **SDCL 22-11-6**; and

COUNT 6: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **IMPEDING HIGHWAY**, in that he did then and there stand upon the paved or improved or main-traveled portion of any highway with intent to impede or stop the flow of traffic, when not otherwise directed by law enforcement or other emergency personnel or to seek assistance for an emergency or inoperable vehicle, in violation of **SDCL 22-18-40**; and

COUNT 7: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN** did commit the public offense of **UNLAWFUL ASSEMBLY**, in that he did then and there assemble with two or more persons for the purpose of engaging in conduct constituting riot or aggravated riot or who, being present at an assembly that either has or develops such a purpose, remains there, with intent to advance that purpose, in violation of **SDCL 22-10-9**; and

COUNT 8: That on or about the **3rd** day of **July**, 2020, in the County of Pennington, State of South Dakota, **NICHOLAS TILSEN**, did commit the offense of **DISORDERLY CONDUCT**, in that (s)he did then and there intentionally cause serious public inconvenience, annoyance, or alarm to any other person or create a risk thereof, by disturbing any lawful assembly or meeting of persons without lawful authority, in violation of **SDCL 22-18-35(3)**, or

contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Probable cause for this Complaint is based on law enforcement reports attached hereto and incorporated herein.

Dated this 6th day of July, 2020, at Rapid City, Pennington County, South Dakota.

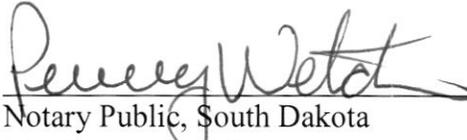


Deputy State's Attorney



Subscribed and sworn to before me this 6th day of July, 2020.

My Commission Expires
September 15, 2022



Notary Public, South Dakota
My Commission Expires: